

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

TEXAS ALLIANCE FOR RETIRED
AMERICANS; SYLVIA BRUNI; DSCC; and
DCCC,

Plaintiffs,

v.

RUTH R. HUGHS, in her official capacity as
the Texas Secretary of State,

Defendant.

CIVIL ACTION NO. 5:20-cv-128

DECLARATION OF JENNIFER ANDERSON
HAYS COUNTY ELECTIONS ADMINISTRATOR

I, Jennifer Anderson, pursuant to 28 U.S.C. § 1746, testify that:

1. My name is Jennifer Anderson. I currently serve as the Elections Administrator in Hays County, Texas, and have served in that capacity for four years.
2. Adding the one-punch, straight ticket voting (“STV”) option back on the ballots now would make it very difficult to ensure the accurate administration of the 2020 general election. We have been preparing for the election for months, and all of those preparations have been done without the STV option. Our staff is already working seven days a week to administer the election, which really has already begun.
3. Requiring the STV option now would mean that we would have to reprogram the entire system and conduct new rounds of testing. Hays County alone has 189 different ballot styles that will be used for the upcoming election.
4. Additionally, we have already mailed out over 11,000 ballots to Texas voters. If we’re required to add the STV option back to the ballots, we would have to send these voters corrected ballots. Based on my experience as an election administrator, I know that sending voters multiple ballots can cause voter confusion. They may not understand why they are receiving a second ballot. They may not know which ballot to send back. It may make them question the accuracy of the process altogether.
5. There is also a huge logistical burden placed on counties when they have to send out corrected mail-in ballots. A voter can vote on either the original or the corrected ballot. But

if the voter sends in both, we have to count the corrected ballot. That means we cannot count the original ballot until after the ballot receipt deadline. Keeping track of which voter mailed back which ballot places a huge strain on our office on top of everything else that we are required to do to administer the election.

6. The law repealing the STV option passed the Texas Legislature in 2017. Since then, we have been talking with voters about the change on the ballot. We have been working towards the 2020 general election without the STV option, and we have started administering the 2020 general election without the STV option. Introducing it back at this point would cause voter confusion and drastically affect our ability to administer a fair and accurate election.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 26, 2020.

/s/ Jennifer Anderson
Jennifer Anderson
Hays County Elections Administrator